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May 14, 2007

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VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: In the Matter of
Public Safety Network in the 700 MHz Broadband
PS Docket No. 06-229 / RM-11348
WT Docket Nos. 06-150, 06-169 and 96-86
Ex Parte Presentation

Dear Ms. Dortch:

On behalf of Cyren Call Communications Corporation ("Cyren Call"), and in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), undersigned counsel hereby submits the instant notice of an *ex parte* presentation.

On May 11, 2007, the following representatives of Cyren Call: Morgan O'Brien, Chairman of the Board; Tom Sidman, Executive Vice President – Business Processes; Bruce Cox, Vice President - Government Affairs; and David Knutson, Vice President – Development, as well as undersigned counsel, met with Julius Knapp of the Office of Engineering and Technology and the following members of the Wireless Telecommunications Bureau: Fred Campbell, John Branscome, Jim Schlichting, Cathy Massey, Paul Murray, Nese Guendelsberger, Peter Trachtenberg, Sharif Shahrier and Ziad Sleem.

The topics of the meeting included 700 MHz issues raised in PS Docket No. 06-229, RM-11348, and WT Docket Nos. 06-150, 06-169 and 96-86 and Cyren Call's positions on those issues as described in its filings in those proceedings. Also included in the discussion were matters raised regarding the recent Further Notice of Proposed Rulemaking in the 700 MHz Consolidated Order (FCC 07-72). Additionally, Cyren Call presented the attached power point presentation.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,

/s/

Elizabeth R. Sachs

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May 14, 2007
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Enclosure

cc: Julius Knapp
Fred Campbell
John Branscome
Jim Schlichting
Cathy Massey
Paul Murray
Nese Guendelsberger
Peter Trachtenberg
Sharif Shahrier
Ziad Sleem

A horizontal graphic of the American flag, featuring the stars and stripes, serves as a background for the title text. The flag is slightly wavy and has a soft, glowing effect.

Public Safety Nationwide Wireless Broadband Network

May 11, 2007

Agenda

- **Review of Cyren Call Assumptions**
- **Review of Shared Public/Private Network Financials**
- **Spectrum Impact on Rural Build**
- **FNPRM Issues**
 - **Do not needlessly restrict E block auction participation**
 - **Service rules**
 - **Public Safety control is important**
 - **Band Plan**

Cyren Call Assumptions

- **Public Safety requires a next generation nationwide interoperable broadband network**
- **This nationwide network requires significant capital and operating expense**
- **Neither Federal nor local funding available: Private investment is required to build and operate the network**
- **Sufficient spectrum is required to support the large public/private user base for a self sustaining business plan**
- **Public Safety must maintain a level of control for the long term over the network, technology requirements, priority levels, features and functionality**

Network Economic Highlights (30 MHz)

- 37,000 cell sites
 - 99.3% U.S. population
 - 63.5% landmass covered (including AK, HI, PR)

- ~\$18 billion cumulative capital expenditures; 30% of total CapEx specific to Public Safety
 - Additional cell sites to meet Public Safety coverage requirements
 - Hardened cell sites
 - Dedicated network operating centers
 - Satellite and interoperability gateways
 - Specialized billing and care systems
 - Research & development for advanced equipment and applications

- 35 million subscribers
 - 11% blended average penetration rate of 335 million total U.S. population (2018)
 - Public Safety: 67% penetration rate of 2.9 million people
 - Critical Infrastructure: 55% penetration rate of 11 million people
 - Commercial: 8% penetration rate of 321 million people; 24% of 111 million employed people

Original Proposal - 30 MHz of Spectrum



<i>Spectrum</i> ²	12 MHz	30 MHz	30 MHz
<i>Services</i>	Voice, Data & Video	Voice, Data & Video	Voice, Data & Video
<i>Usage Profile</i>	Heavy Public Safety	Mix of Usage Profiles	Average Commercial
<i>Call Completion Rate</i>	99.999%	User Type Dependent	98%

1. Mix of 2 million Public Safety subscribers, 6 million Critical Infrastructure subscribers, and 27 million Commercial subscribers.
2. Contiguous paired spectrum in upper 700 MHz spectrum band.

Spectrum Impact on Rural Build

(0) Base Case

Spectrum Position Scenarios (PS contributes 10 MHz usable spectrum, balance acquired through auction or acquisition)

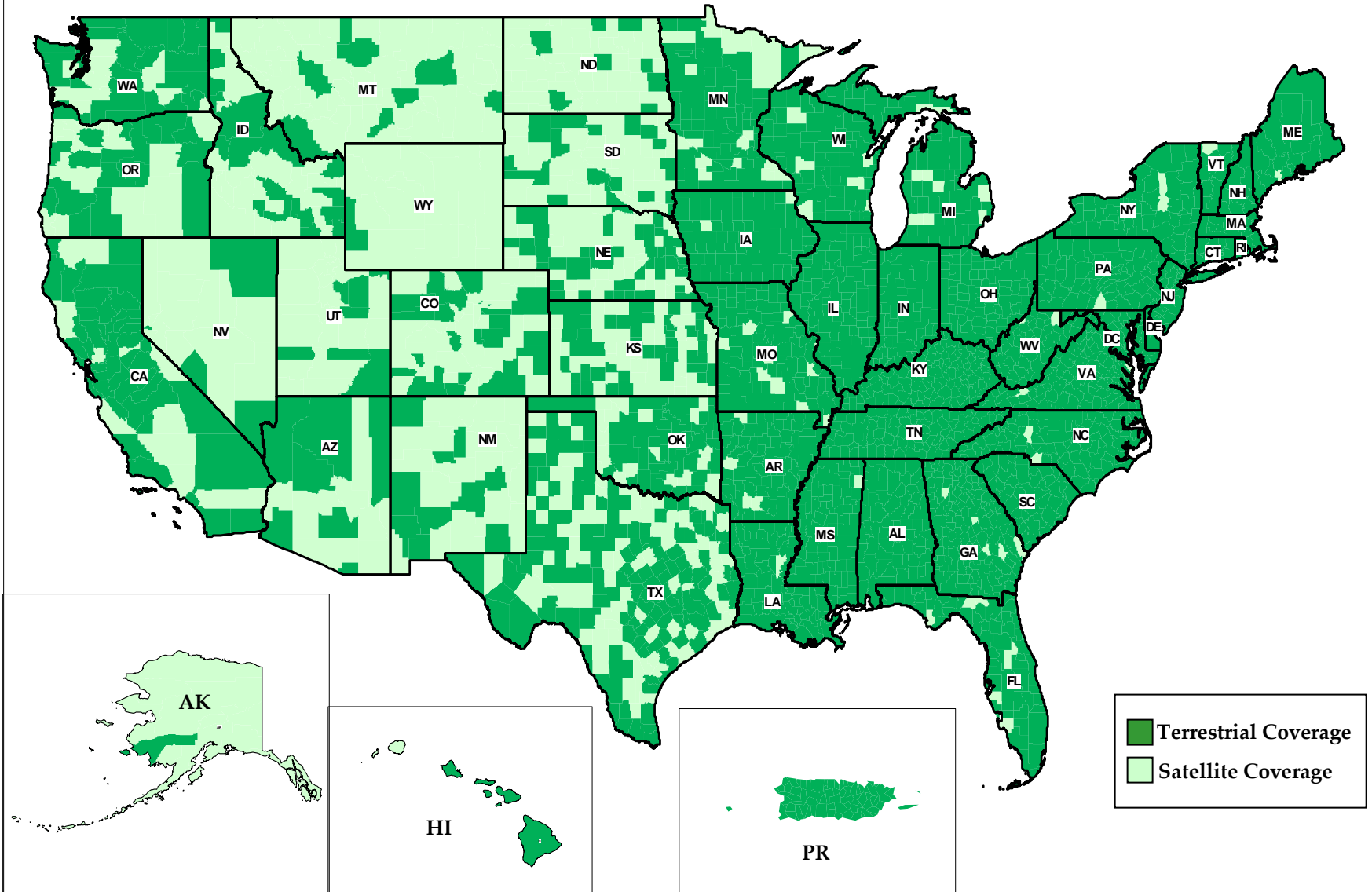
- (I) Maintain urban capacity, lose rural coverage**
- (II) Maintain urban capacity, lose rural coverage**
- (III) Maintain urban capacity, maintain rural coverage**

	(0)	(I)	(II)	(III)
	Base 30 MHz	24 MHz	20 MHz	20MHz
Total Sites	37.0K	37.0K	37.0K	41.4
Total Rural Sites	16.8K	14.8K	12.4K	16.8K
Population Covered	99.3%	98.9%	97.9%	99.3%
Geography Covered	63.5%	57.3%	50.0%	63.5%
CONUS Covered Geography	75.0%	67.8%	59%	75.0%
Population Density Threshold	≥ 5	≥ 8	≥ 14	≥ 5

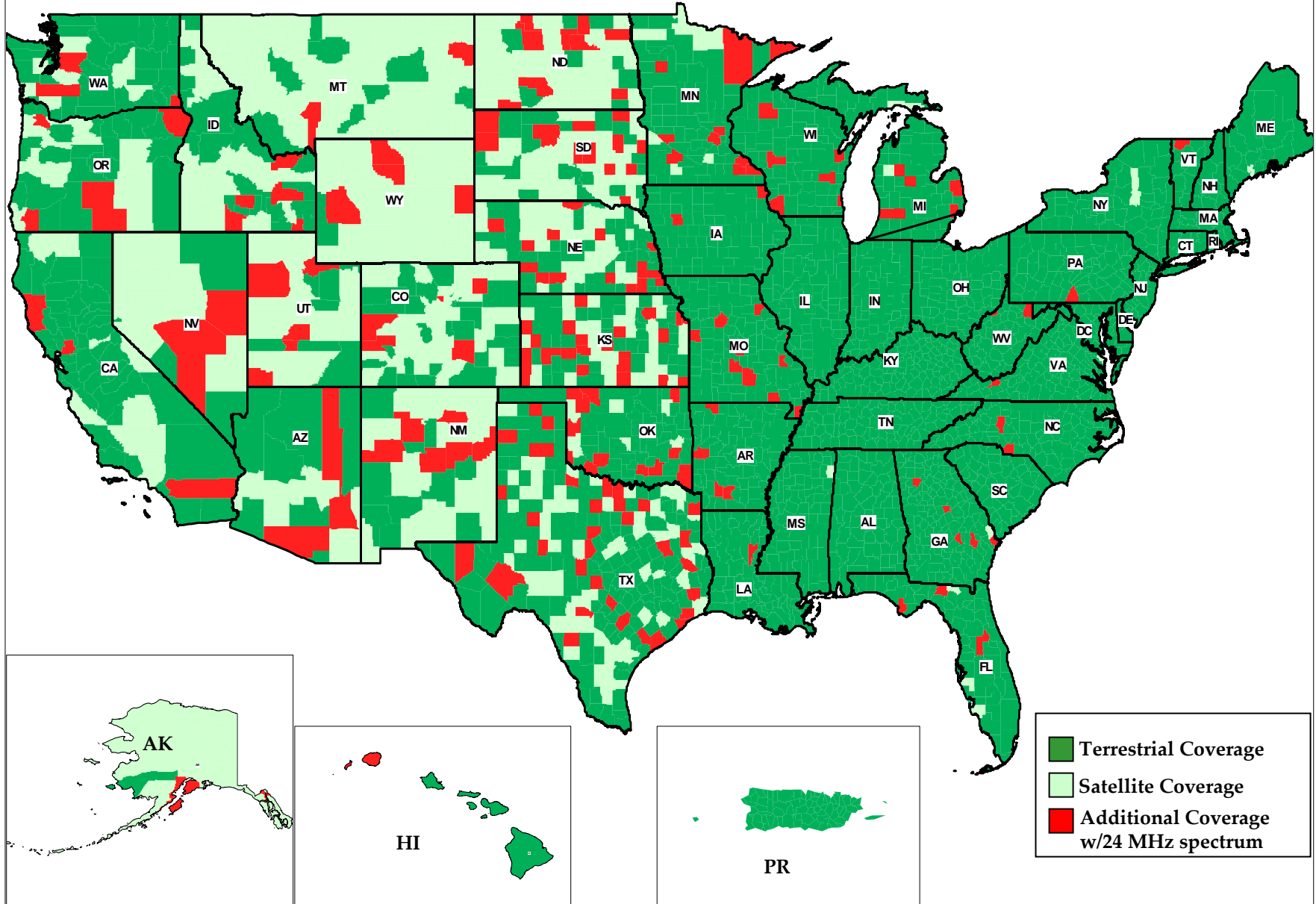
Less Spectrum = Less rural build for the same dollar investment or more cost to maintain the same rural build

20 MHz Allocation – Network Coverage

37K Cell Sites



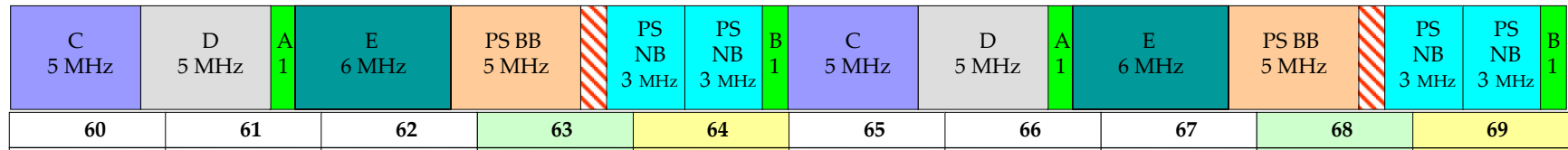
24 MHz Allocation – Additional Network Coverage Gains vs 20 MHz 37K Cell Sites



FNPRM Issues

- **Do not needlessly restrict E block auction participation**
- **Service rules**
- **Public Safety control is paramount**
- **Band Plan**

Proposed 700 MHz Band Plan



- **Based on FCC Band Plan #4 with a few modifications:**
 - C and D Blocks change from 5.5 MHz \Rightarrow 5 MHz
 - E Block changes from 5 MHz \Rightarrow 6 MHz
 - Move A Block between D and E Blocks
- **E Block winner required to build a shared public/private network supporting Public Safety**
- **E Block winner has access to a minimum of 22 MHz and possibly 24 MHz (through acquisition of A Block license) of spectrum to construct a public/private broadband network to serve Public Safety**
- **May make the E block and Public Safety/Private shared broadband band more attractive to carriers seeking a large national footprint with the largest available combination block of 22/24 MHz**
- **Keeps Public Safety spectrum allocation at 24 MHz**
- **Solution for Canadian border Public Safety narrowband interference issue**
- **A Block placement benefits**
 - Allows either the D or E Block licensees to bid to acquire the A Block
- **Potential for Commercial Only 11x11 MHz block (C+D+A Blocks)**